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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Nelson L. Bruce, Sui Juris)	
)	
Plaintiff)	Case No.: 2:19-cv-03456-BHH-KDW
)	
- v -)	
)	PLAINTIFF'S OPPOSITION TO
BANK OF AMERICA, N.A.)	DEFENDANT'S MOTION TO STRIKE
(A.K.A. BANK OF AMERICA), et al.)	
)	
Defendants.)	
)	

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO STRIKE

Comes now Plaintiff with his objections to Defendant's Motion to Strike Plaintiff's alleged untimely notice of Expert Witness. Plaintiff objects Defendants motion as they are improperly misconstruing my notice in an attempt to strike my notice of expert witness when it clearly states that "I have no current list of expert witnesses" at the moment but I am reserving my rights to call on an expert witness depending on what claims and or evidence comes forth during the course of this action which I have a reserved and retained right to do as well as the defendant otherwise it would be a violation rights to redress and seek justice. My notice does not state that I wish to call myself as an expert witness, therefore I object to this allegation by the defendant. The notice mentions no such attempt to amend the court's scheduling order as there has been no requests in my notice for an amendment, only a reservation of rights which I hereby exercise at all times, therefore I object to the defendant's allegations in their motion to strike in regards to this. This notice of expert witness was filed timely by the Plaintiff, before August 24, 2020 therefore it is not untimely, defective, or does not comply

with the courts scheduling order, and federal rules of evidence for expert testimony therefore I object and therefore the defendants improper motion to strike should be denied.

Date this 11th day of **September, 2020**.

RESPECTFULLY PRESENTED,

“Without Prejudice”

Nelson L. Bruce
/s/ Nelson L. Bruce

Nelson L. Bruce, Propria Persona, Sui Juris
“All Natural Rights Explicitly Reserved and Retained”
U.C.C.1-207/ 1-308, 1-103.6
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CERTIFICATE OF SERVICE

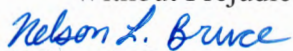
I HEREBY CERTIFY that a true and correct copy of the foregoing will be electronically mailed to all parties on the service list **via the: UNITED STATES POSTAL SERVICE by the UNITED STATES POST OFFICE via Postage Prepaid Priority Mail.**

SENT TO:

McGuire Woods LLP
Attention: Brian A. Calub
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202-2146
(704) 343-2009

Counsel of Record Attorney for Defendant Bank of America, N.A.

“Without Prejudice”


/s/ Nelson L. Bruce

Nelson L. Bruce, Propria Persona, Sui Juris
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